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2013 MAY 30 PM 5: 51

**FIRST GENERAL COUNSEL'S REPORT**

**CELA**

MUR 6654

DATE COMPLAINT FILED: Sept. 28, 2012  
DATE OF NOTIFICATION: Oct. 4, 2012  
DATE OF LAST RESPONSE: Nov. 20, 2012  
DATE ACTIVATED: Mar. 1, 2013

EXPIRATION OF SOL: Earliest – Sept. 18, 2017  
Latest – Sept. 21, 2017

**COMPLAINANT:**

Connecticut Democratic Party

**RESPONDENTS:**

Roraback for Congress and Anna-Elysapeth  
McGuire in her official capacity as treasurer  
Obsitnik for Congress, Inc. and Bradley Crate in his  
official capacity as treasurer

**RELEVANT STATUTES  
AND REGULATIONS:**

2 U.S.C. § 431(8)(B)(ii)  
2 U.S.C. § 432(e)(3)(B)  
11 C.F.R. § 102.17  
11 C.F.R. § 100.77  
11 C.F.R. § 100.137

**INTERNAL REPORTS CHECKED:**

Disclosure Reports

**FEDERAL AGENCIES CHECKED:**

None

**I. INTRODUCTION**

Roraback for Congress ("Roraback Committee") and Obsitnik for Congress, Inc.  
("Obsitnik Committee") (collectively "Committees") held a fundraising event in Darien,  
Connecticut on the evening of September 18, 2012 ("event"). Complainant alleges that this was  
a joint fundraising event and that both participating committees violated 11 C.F.R. § 102.17 by

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1 failing to comply with Commission regulations regarding joint fundraising.<sup>1</sup> Specifically, the  
2 Complaint asserts that Respondents failed to (1) establish a joint fundraising committee for the  
3 purpose of administrating the event and (2) provide the appropriate joint fundraising notice to  
4 prospective donors in the event invitation.<sup>2</sup> The Roraback Committee and the Obsitnik  
5 Committee deny these allegations and request that the Commission dismiss the matter.<sup>3</sup>

6 Based on the available information, it appears that the September 18, 2012, event  
7 qualified as a joint fundraiser under the Commission's regulations; thus the Committees were  
8 obligated to comply with the procedures in section 102.17. The Committees failed, however, to  
9 conform to the Commission's joint fundraising regulations. Accordingly, the Office of General  
10 Counsel recommends that the Commission find reason to believe that the Roraback Committee  
11 and the Obsitnik Committee violated 11 C.F.R. § 102.17; approve the attached Factual and Legal  
12 Analyses;

## 13 II. FACTUAL BACKGROUND

14 In 2012, Andrew Roraback and Steve Obsitnik were the Republican nominees in adjacent  
15 Connecticut Congressional districts — Roraback in the 5th Congressional District and Obsitnik  
16 in the 4th Congressional District. On September 18, 2012, a fundraising event was held at the  
17 Darien, Connecticut residence of Mae and Cynthia Brightm.<sup>4</sup> The invitation describes the event  
18 as a "cocktail reception" to support "U.S. CONGRESS CANDIDATES STEVE OBSITNIK, FOURTH

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<sup>1</sup> Joint fundraising is election-related fundraising conducted jointly by a political committee and one or more other political committees or unregistered organizations. 11 C.F.R. § 102.17(a)(1)(i).

<sup>2</sup> Compl. at 1; 11 C.F.R. § 102.17(a)-(c).

<sup>3</sup> Roraback Committee Resp. at 1 (Nov. 16, 2012); Obsitnik Committee Resp. at 1 (Nov. 20, 2012).

<sup>4</sup> Compl., Ex. A.

1 CONGRESSIONAL DISTRICT & ANDREW RORABACK, FIFTH CONGRESSIONAL DISTRICT.”<sup>5</sup> The  
2 first page features the logos of the Roraback and Obsitnik campaigns at the top followed by a list  
3 of the evening's hosts, which included former state senator and 2010 Republican candidate for  
4 the 4th Congressional district Dan Debicella, and 16 office holders and party officials.<sup>6</sup> In  
5 addition to providing the date, time, and location of the event, the invitation states that the  
6 “[S]UGGESTED CONTRIBUTION IS \$500 PER CANDIDATE (\$1,000 TOTAL).” Invitees are advised to  
7 respond by telephone or via e-mail to Ali Almour.<sup>7</sup> A box at the bottom of the invitation  
8 contains the following disclaimer: “PAID FOR BY OBSITNIK FOR CONGRESS & RORABACK FOR  
9 CONGRESS.”<sup>8</sup>

10 The invitation also includes a response form, with the names of the two Committees in  
11 bold at the top of the form. Invitees were asked to check off a box if they were attending the  
12 event and indicate the amount of their contribution: “\$\_\_\_FOR\_\_\_RESERVATIONS AT \$500 FOR  
13 OBSITNIK FOR CONGRESS AND \$500 FOR RORABACK FOR CONGRESS (COMBINED \$1,000 PER  
14 PERSON).”<sup>9</sup> The response form directs invitees to make contribution checks directly payable to  
15 Obsitnik for Congress or Roraback for Congress and provides a separate address for each

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<sup>5</sup> A second invitation to the event is attached to the Complaint as Exhibit B. This invitation is identical to the joint invitation found at Exhibit A, except that it references only candidate Obsitnik and does not include a response form. (It is unlikely that this particular version of Exhibit B was ever distributed as it contains a typographical error.) The Complaint alleges that in response to press inquiries regarding whether the Roraback and Obsitnik Committees were holding a joint fundraiser in violation of Commission regulations, each Committee attempted to conceal their actions by subsequently issuing separate invitations that did not reference the other joint participant. According to the Complaint, Exhibit B may be one of these invitations. Compl. at 2. The Roraback Committee denies attempting to conceal potential violations of the Commission's regulations in this manner, while the Obsitnik Committee does not address this particular allegation or Exhibit B. Roraback Committee Resp. at 8-10.

<sup>6</sup> Compl., Ex. A.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

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1 campaign.<sup>10</sup> The response form concludes with the disclaimer "PAID FOR BY OBSITNIK FOR  
2 CONGRESS AND RORABACK FOR CONGRESS."<sup>11</sup>

3 The record does not reflect how many invitations were distributed or how many  
4 individuals responded with contributions or attended the event, although the Obsitnik Committee  
5 stated that each campaign raised approximately \$11,000 in connection with the fundraiser.<sup>12</sup> The  
6 Committees' disclosure reports indicate that 14 individuals made contributions in amounts  
7 between \$500 and \$1,500 (totaling \$20,500) to the Obsitnik Committee and the Roraback  
8 Committee on the day of, or within several days of, the event.<sup>13</sup> Eleven of these contributors,  
9 including Mac Brighton and the event host Dave Debicella, each gave the same amount of  
10 money to both the Obsitnik Committee and the Roraback Committee on the same dates (either  
11 September 18 or 19, 2012).<sup>14</sup>

12 According to the Obsitnik Committee, the Brightons used personal funds to pay for event  
13 costs, including food and beverages, catering staff, and flowers.<sup>15</sup> The Obsitnik Committee  
14 states that the Brightons' food and beverage costs did not exceed \$1,000, and the catering staff  
15 and flowers cost approximately \$650.<sup>16</sup> Logistics for the event were handled by the Obsitnik

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<sup>10</sup> *Id.* Contributors opting to make their donation by credit card are asked to provide the amount to be charged, card number/expiration date, and signature in a separate box. The response form also requests that contributors whose contributions exceed \$200 provide his/her name, address, occupation, and contact information. *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> Obsitnik Committee Resp. at 2.

<sup>13</sup> See Roraback Committee 2012 October Quarterly Report at Schedule A; Obsitnik Committee 2012 October Quarterly Report at Schedule A.

<sup>14</sup> See Roraback Committee 2012 October Quarterly Report at Schedule A at 17, 35; Obsitnik Committee October Quarterly Report at Schedule A at 20, 37.

<sup>15</sup> Obsitnik Committee Resp. at 2.

<sup>16</sup> The Obsitnik Committee notes that the \$650 spent on the flowers and catering was well below the \$2,500 per election contribution limit for individuals and the \$2,000 limit per election contribution limit between authorized

1 Committee's fundraising consultant, Alexandra Almour of Tusk Productions, LLC ("Tusk").<sup>17</sup>  
2 Almour produced and distributed (via e-mail) the event invitation and served as the contact  
3 person for event attendees and the two participating committees.<sup>18</sup>

4 The Obsitnik Committee admits that the campaign paid for Almour's services, but does  
5 state not how much money it paid her for this event.<sup>19</sup> The Obsitnik Committee's disclosure  
6 reports reflect three payments to Almour during the general election period: \$5,000 on August  
7 14, 2012, for "fundraising consulting"; \$2,071.93 for "in-kind printing and design services" as  
8 well as a "contribution refund" for the same amount on September 4, 2012; and \$5,140.71 on  
9 October 10, 2012, for "fundraising consulting."<sup>20</sup> There is insufficient information to indicate  
10 which, if any, of these disbursements were made in connection with the event.

11 Both Respondents deny that the event was a joint fundraiser conducted in violation of  
12 section 102.17.<sup>21</sup> According to the Roraback Committee, the event was a private gathering held  
13 to honor Roraback and Obsitnik, Republican members of the Connecticut General Assembly,

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committees. Obsitnik Committee Resp. at 2; 2 U.S.C. §§ 441a(a)(1), 432(e)(3)(B). Mac Brighton contributed \$500 to the Obsitnik Committee on September 18, 2012, and \$500 to the Roraback Committee on September 19, 2012. There is no indication that the \$650 the Brightons spent on flowers or the catering staff was reported as an in-kind contribution by either Committee, nor is the amount reflected on any disclosure report as a contribution from the Obsitnik Committee to the Roraback Committee.

<sup>17</sup> Tusk provides comprehensive fundraising consulting at the local, state, and federal levels in New York, New Jersey and Connecticut. <http://tuskproductions.net> (last visited Mar. 25, 2013). In addition to providing fundraising services to the Obsitnik Committee, Almour's clients have included one of the event hosts, Dan Debicella, who ran for Congress in 2010. *Id.*

<sup>18</sup> Compl., Ex. A; Obsitnik Committee Supp. Resp. at 1 (May 2, 2013); Roraback Committee Resp. at 4-6; Roraback Committee Supp. Resp. at 2 (Apr. 29, 2013).

<sup>19</sup> Obsitnik Committee Supp. Resp. at 1.

<sup>20</sup> See 2012 October Quarterly Report at 157, 158, 232; 2012 Pre-General Report at 41.

<sup>21</sup> Roraback Committee Resp. at 2-3; Obsitnik Committee Resp. at 1-2. The Roraback Committee is listed as a joint fundraising participant on the Statement of Organization filed by a joint fundraising committee called Young Guns 2012 Round 4 ("Young Guns"). (RAD sent the Roraback Committee a Request for Additional Information, dated Jan. 9, 2013, regarding its failure to list its participation in this joint fundraising committee on its Statement of Organization.) Young Guns disbursed over \$3,000 to the Roraback Committee in September 2012.

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1 officials from the Connecticut Republican party, and other individuals.<sup>22</sup> The Roraback  
2 Committee states that the event provided an opportunity for the candidates in attendance to  
3 engage in fundraising, although the Committee emphasizes that the event did not involve the  
4 joint collection and sharing of donations from event attendees.<sup>23</sup>

5 According to the Roraback Committee, the event was planned and promoted without its  
6 "direct knowledge" by Tusk.<sup>24</sup> The Roraback Committee denies having any relationship or  
7 affiliation with Tusk or retaining Tusk for any purpose during the 2012 election, and states that it  
8 did not plan, develop, or market the event in association with Tusk, or make any payments to  
9 Tusk in connection with the event.<sup>25</sup> The Roraback Committee asserts that the only interaction  
10 between the campaign and Tusk were employee communications necessary "to ensure Mr.  
11 Roraback's attendance" at the Darien event and for "overall logistical ease."<sup>26</sup> The Roraback  
12 Committee also denies coordinating the event with the Obsitnik Committee or participating in  
13 the development, production, printing, or distribution of materials characterizing the event as a  
14 joint event.<sup>27</sup>

15 According to the Roraback Committee, any indication that the event was a joint  
16 fundraiser was the result of an "inadvertent" mistake made by event planner Tusk, which made  
17 errors while "drafting or printing the invitations."<sup>28</sup> The Roraback Committee suggests that the

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<sup>22</sup> Roraback Committee Resp. at 4.

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* at 7.

<sup>25</sup> Roraback Committee Supp. Resp. at 3.

<sup>26</sup> Roraback Committee Resp. at 5; Roraback Committee Supp. Resp. at 2.

<sup>27</sup> Roraback Committee Resp. at 5-6.

<sup>28</sup> *Id.* at 4.

1 existence of two different "flyers" (Compl., Ex. A, Ex. B) supports the theory that Tusk made an  
2 error in identifying the event as a joint event for the Committees.<sup>29</sup>

3 The Obsitnik Committee describes the cocktail reception as a "small, grassroots  
4 fundraiser."<sup>30</sup> It argues that the event is covered by the "volunteer exception" for campaign  
5 related activity because the Brightons held the event in their residence and used personal funds to  
6 pay the allegedly *de minimis* costs associated with providing food and beverages at the event.<sup>31</sup>

7 The Obsitnik Committee asserts that the Committees did not "share costs or allocate proceeds" in  
8 connection with the event and states that attendees wrote checks directly to each campaign.<sup>32</sup>

9 The Obsitnik Committee asks the Commission to dismiss this matter because the event was  
10 allegedly a small, one-time event where the receipts were collected and screened separately and  
11 that did not prevent disclosure or enhance the chance of one of the Committees receiving  
12 unlawful contributions.<sup>33</sup>

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<sup>29</sup> Roraback Committee Resp. at 6.

<sup>30</sup> Obsitnik Committee Resp. at 1.

<sup>31</sup> *Id.* at 2. The term "contribution" or "expenditure" does not include the cost of invitations, food and beverages where such items are voluntarily provided by an individual volunteering personal services on the individual's residential premises. The aggregate value of such invitations, food and beverages provided by the individual on behalf of the candidate may not exceed \$1,000 with respect to any single election. 2 U.S.C. § 431(8)(B)(ii); 11 C.F.R. §§ 100.77, 100.137. The Obsitnik Committee's argument that the event was covered under the "volunteer exception," fails to address the invitations that the Committee paid its fundraising consultant to produce for the event. Obsitnik Committee Resp. at 1-2; Obsitnik Committee Supp. Resp. at 1.

<sup>32</sup> *Id.* at 2.

<sup>33</sup> *Id.*

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**III. LEGAL ANALYSIS**

The Complaint, Responses, and available information demonstrate that (A) the event was a joint fundraiser and (B) that the Obsitnik Committee and the Roraback Committee failed to follow the Commission's regulations for conducting the event.

**A. The September 18, 2012, Event was a Joint Fundraiser**

The record demonstrates that the event qualified as a joint fundraiser. In MUR 5780 (Santorum), the Commission determined that an event qualifies as a joint fundraiser when two participant committees organize one event held on the same date, at the same time, at the same private residence, and share costs.<sup>34</sup> Here, there was a single event, held on the same date at one location, hosted by the same group of individuals, with prospective contributors solicited via a joint invitation specifying that the event was in support of both Obsitnik and Roraback.

The Obsitnik Committee contends that the event expenses were not shared and were beyond the parameters of the joint fundraising regulations because they were covered by the "volunteer exception." These contentions, however, are contradicted by the record facts. The Obsitnik Committee paid an unknown amount of money for its own fundraising consultant to provide planning and logistical services in connection with the event, including producing and distributing the event invitation, serving as the point of contact for responses and attendees, and communicating with Roraback Committee staff regarding the candidate's travel to the event. These services benefited the Roraback Committee as well as the Obsitnik Committee and the related disbursement should have been shared by the Committees.<sup>35</sup>

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<sup>34</sup> See Factual & Legal Analysis at 5, MUR 5780 (Santorum 2006).

<sup>35</sup> Compl., Ex. A; Roraback Committee Resp. at 5; Obsitnik Committee Supp. Rep. at 1.

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1           The Roraback Committee claims — without the support of sworn statements — that it  
2 did not have “direct knowledge” of Tusk’s actions on its behalf. But this claim is belied by the  
3 fact that Roraback actually participated in the event, was prominently featured in the invitations,  
4 and raised significant amounts of money at the event. Further, the Roraback Committee  
5 acknowledges that it was aware that the consulting firm was in charge of planning and handling  
6 logistics for the event — the sole purpose of which was to raise funds for both Committees —  
7 and that it used Tusk’s services in making sure the candidate arrived at the event.<sup>36</sup>

8           Accordingly, the event was a joint fundraiser, and therefore was required to comply with  
9 11 C.F.R. § 102.17.

10           **B.     The Committees Failed to Comply with 11 C.F.R. § 102.17**

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12           The Committees September 18, 2012, joint fundraiser failed to comply with the  
13 Commission’s regulation governing joint fundraisers, 11 C.F.R. § 102.17. That regulation  
14 allows political committees to engage in joint fundraising efforts, but to do so, they must either  
15 establish a separate committee or designate a participating committee as the fundraising  
16 representative.<sup>37</sup> Participants must enter into a written agreement that identifies the fundraising  
17 representative and states the formula for the allocation of fundraising proceeds.<sup>38</sup> The  
18 fundraising representative must retain a copy of the agreement for a period of three years and  
19 make it available to the Commission upon request.<sup>39</sup>

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<sup>36</sup>     Roraback Committee Resp. at 4-6; Roraback Committee Supp. Resp. at 3.

<sup>37</sup>     11 C.F.R. § 102.17(a)(1)(i).

<sup>38</sup>     11 C.F.R. § 102.17(c)(1).

<sup>39</sup>     *Id.*

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1 The regulations also provide that a joint fundraising notice shall be included with every  
2 solicitation for contributions.<sup>40</sup> The notice shall include the names of all participating  
3 committees; the allocation formula to be used; a statement that, notwithstanding the stated  
4 allocation formula, contributors may designate that their contributions be allocated differently;  
5 and a statement that the allocation formula may change if a contributor makes a contribution  
6 which would exceed the amount that a contributor may give to a participant.<sup>41</sup> Furthermore,  
7 joint fundraising participants or the fundraising representative shall establish a separate  
8 depository account to be used solely for the receipt and disbursement of the joint fundraising  
9 proceeds.<sup>42</sup> The fundraising representative and participants must screen all contributions to  
10 make sure they comply with the source and amount limitations of the Federal Election Campaign  
11 Act of 1971, as amended (the "Act"). To facilitate this screening, participants must provide the  
12 fundraising representative with records of past contributions so the representative can determine  
13 whether the donor has exceeded the Act's contribution limits.<sup>43</sup> Gross proceeds as well as  
14 expenses and the distribution of net proceeds from joint fundraising efforts are to be allocated  
15 according to the formula provided in the written agreement.<sup>44</sup>

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<sup>40</sup> 11 C.F.R. § 102.17(c)(2). The fundraising notice is in addition to the disclaimer notice required under 11 C.F.R. § 110.11. See Advisory Op. 2007-24 (Burkee/Walz) at 4.

<sup>41</sup> 11 C.F.R. § 102.17(c)(2)(i).

<sup>42</sup> 11 C.F.R. § 102.17(c)(3)(i).

<sup>43</sup> 11 C.F.R. § 102.17(c)(4)(i) and (c)(5).

<sup>44</sup> 11 C.F.R. § 102.17(c)(6)-(7). Participants may advance funds to the joint fundraising representative for start-up costs of the fundraiser. The amount advanced by a participant should be in proportion to the agreed upon allocation formula. Any amount advanced in excess of a participant's proportionate share is considered a contribution and must not exceed the amount the participant may contribute to the other participants. 11 C.F.R. § 102.17(b)(3)(i) and (ii). The amount that a participant may legally contribute to the remaining participants is \$2,000 because of the limitation on the amount of support that a principal campaign committee of a Federal candidate may provide to other Federal candidates and still maintain its status as a principal campaign committee. 2 U.S.C. § 432(e)(3)(B); 11 C.F.R. § 102.12(c)(2). So, while one participating committee is not expressly prohibited from paying 100% of the expenses of a joint fundraising event and seeking reimbursement from the other

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1 Here, the Committees did not comply with section 102.17. They did not establish or  
2 designate a joint fundraising committee, did not provide the required joint fundraising notice, did  
3 not enter into a shared written agreement or determine an allocation formula, and did not allocate  
4 receipts and expenditures according to an established formula.<sup>45</sup>

5 The Obsitnik Committee argues that the Commission should follow MUR 6039 (Diaz-  
6 Balart) and dismiss this matter. But MUR 6039 is inapposite. In that matter, the Commission  
7 dismissed the complaint based on the minimal costs (\$400) associated with the fundraiser, and  
8 because those costs were donated by the individuals hosting the event at their residence.<sup>46</sup> The  
9 Commission noted that, apart from a *de minimis* payment for a photographer, the participating  
10 committees did not advance any funds for the event that could have resulted in an excessive  
11 contribution to each other, and did not share any receipts that might have resulted in the  
12 misallocation of event proceeds.<sup>47</sup>

13 Here, in contrast, the event was organized by a professional fundraiser who was paid over  
14 \$12,000 around the time of the event, and her services benefited both participating committees,  
15 each of which raised approximately \$11,000 from the event.<sup>48</sup> Therefore, unlike in the Diaz-  
16 Balart matter, Respondents' failure to conform to the Commission's joint fundraising controls

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participating committees, that Committee may not advance more than \$2,000 in the aggregate to the other participating committee. See AO 2007-04 (Burke/Walz) at 7. The Obsitnik Committee's disbursement for the shared services provided by Almour could conceivably be treated as a violation of section 432(e)(3)(B), but would require an investigation to determine the exact amount of money paid to Almour. For the reasons discussed *infra*, this Office believes that following the precedent of MUR 5780 (Santorum) and pursuing a section 102.17 violation is more appropriate.

<sup>45</sup> See 11 C.F.R. § 102.17(c).

<sup>46</sup> Factual & Legal Analysis at 3, MUR 6039 (Diaz-Balart).

<sup>47</sup> *Id.*

<sup>48</sup> See *supra* p. 6.

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1 caused the Obsitnik Committee to pay for services that benefited the Roraback Committee and  
2 also prevented accurate recordkeeping and disclosure.

3 MUR 5780 (Santorum 2006), unlike MUR 6039, is instructive here.<sup>49</sup> In MUR 5780, the  
4 Commission found reason to believe that the respondents violated section 102.17(c) based on a  
5 similar set of facts as those present here, namely that the joint fundraiser was held on the same  
6 date, at the same time, and at the same private residence, with one event expense paid  
7 exclusively by one of the participating committees, although the contributions received  
8 benefitted both participating committees.<sup>50</sup>

9 We recommend, therefore, that the Commission find reason to believe that Obsitnik for  
10 Congress, Inc. and Roraback for Congress violated 11 C.F.R. § 102.17.

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18 **V. RECOMMENDATIONS**

- 19 1. Find reason to believe that Obsitnik for Congress, Inc. and Bradley Crate in his  
20 official capacity as treasurer violated 11 C.F.R. § 102.17.

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<sup>49</sup> Roraback Resp. at 7-8; Obsitnik Resp. at 3-4.

<sup>50</sup> Factual & Legal Analysis at 7, MUR 5780 (Santorum). The Commission also found reason to believe that the Santorum campaign violated 2 U.S.C. § 441d(c)(2) and 11 C.F.R. § 110.11(c)(2)(ii). See Certification at ¶¶ 1-2 MUR 5780 (Santorum) (Mar. 6, 2007).

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2. Find reason to believe that Roraback for Congress and Anna-Elysapeth McGuire in her official capacity as treasurer violated 11 C.F.R. § 102.17.
3. Approve the attached Factual and Legal Analyses.
4. . . . .
5. Approve the appropriate letters.

Anthony Herman  
General Counsel

May 30, 2013  
Date

By: Kathleen Guith by PGP  
Kathleen Guith  
Deputy Associate General Counsel  
For Enforcement

Peter G. Blumberg  
Peter G. Blumberg  
Assistant General Counsel

Marianne Abely  
Marianne Abely  
Attorney

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